

MEMO ENDORSED

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

TÜRKİYE HALK BANKASI A.Ş.,

Defendant.

S6 15 Cr. 867 (RMB)

DEFENDANT TÜRKİYE HALK BANKASI A.Ş.'S MOTION TO RECUSE THE COURT

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law and materials cited therein, the undersigned will move this Court before the Honorable Richard M. Berman, in Room 17B of the United States District Court, 500 Pearl Street, New York, New York, 10007, for an order recusing the assigned judge from this case pursuant to 28 U.S.C. § 455.

PLEASE TAKE FURTHER NOTICE, that pursuant to the Court's June 30, 2020, Order, opposition papers, if any, shall be served by July 28, 2020, and reply papers, if any, shall be served by August 4, 2020, with argument to be heard at a date and time to be set by the Court.

Halkbank respectfully requests oral argument on this motion.

Dated: July 14, 2020

Respectfully submitted,

WILLIAMS & CONNOLLY LLP

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We have a busy but very doable motion schedule between now and the trial date. Counsel will need to (much) better adhere to the Court's Individual Rules and applicable cases and Federal Rules regarding, among other things, length of submissions (briefs and reply briefs for example), "expert testimony," exhibits, documents submitted in foreign languages, etc. The Court reserves the right to dismiss and/or disregard (in whole or in part) submissions which do not conform to applicable practice, procedure and case law.

Application for oral argument is respectfully denied. The Court has more than enough information to resolve defendant's motion to recuse.

SO ORDERED

Dated: July 31, 2020



RICHARD M. BERMAN
